

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

UNITED STATES OF AMERICA;)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:24-cv-02101
)	
THE STATE OF TENNESSEE and the)	Chief Judge Lipman
TENNESSEE BUREAU OF)	
INVESTIGATION;)	Magistrate Judge Pham
)	
Defendants.)	
)	

UNOPPOSED MOTION TO CONSOLIDATE

Defendants the State of Tennessee and the Tennessee Bureau of Investigation hereby move pursuant to Federal Rule of Civil Procedure 42 to consolidate this case with *OUTMemphis et al, v. Bill Lee*, et al, Case No. 2:23-cv-2670-SHL-CGC, so that the two cases, which involve common questions of law and fact, may proceed jointly; so that piecemeal litigation may be avoided; and so that consistent justice may be achieved.

In further support of this Motion, counsel for Defendants represents that counsel for the United States has been consulted, who does not oppose consolidation. For these reasons, and those set forth in the accompanying memorandum of law, Defendants request that this case be consolidated with No. 2:23-cv-2670.

Respectfully submitted,

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/s/ Cody N. Brandon
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was filed and served via the Court's electronic filing system on this the 25th day of March 2024, upon:

Kristen Clarke
Assistant Attorney General
Civil Rights Division

Stephanie M. Berger
Trial Attorney
Disability Rights Division

U.S. Department of Justice
150 M Street NE
Washington, D.C. 20002

/s/ Cody N. Brandon

CODY N. BRANDON